

EXHIBIT A

DAVIS POLK & WARDWELL

450 LEXINGTON AVENUE
NEW YORK, NY 10017

212 450 4000
FAX 212 450 3800

MENLO PARK
WASHINGTON, D.C.
LONDON
PARIS
FRANKFURT
MADRID
TOKYO
BEIJING
HONG KONG

CHRISTOPHER J. ROCHE
212 450 4513
CHRISTOPHER.ROCHE@DPW.COM

November 15, 2007

Re: In re Neurontin Marketing, Sales Practices & Products Liability Litig.,
MDL 1629

Andrew G. Finkelstein, Esq.
Eleanor L. Polimeni, Esq.
Kenneth B. Fromson, Esq.
Finkelstein & Partners, LLP
436 Robinson Avenue
Newburgh, New York 12550

Counsel:

Please find enclosed a copy of Defendants' supplemental Fed. R. Civ. P.
26(a)(1) disclosure statement.

Please call me at the number above if you have any questions.

Very truly yours,



Christopher J. Roche

Enclosure

By Overnight Courier

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

-----	x	
In re: NEURONTIN MARKETING, SALES PRACTICES, AND PRODUCTS LIABILITY LITIGATION	:	MDL Docket No. 1629
	:	Master File No. 04-10981
-----	x	
THIS DOCUMENT RELATES TO:	:	Judge Patti B. Saris
	:	Magistrate Judge Leo T. Sorokin
-----	x	
ALL ACTIONS	:	
	:	
-----	x	

DEFENDANTS' SUPPLEMENTAL DISCLOSURE STATEMENT

PLEASE TAKE NOTICE that, pursuant to Rule 26(a)(1) of the Federal Rules of Civil Procedure, Defendants Pfizer Inc., Parke-Davis, a division of Warner-Lambert Company and Warner-Lambert Company LLC, Warner-Lambert Company, and Warner Lambert Company LLC ("Defendants") make and amend their disclosures as follows.

These responses are made subject to all objections as to competence, materiality, relevance, or other objections as to admissibility that may apply in the event that any such response, or the information contained in it, is sought to be used in court. Defendants expressly reserve all such objections.

- A. **Rule 26(a)(1)(A): The name and, if known, the address and telephone number of each individual likely to have discoverable information that the disclosing party may use to support its claims or defenses, unless solely for impeachment, identifying the subjects of the information.**

Discovery and investigation in these actions are on-going. Based on the information reasonably available, Defendants are unable at the present time to identify each and every individual who would have discoverable information that the Defendants may use to support

their claims or defenses in the case, and the subjects of such information. Defendants reserve the right to supplement these disclosures as they become aware of additional individuals who have such information.

Subject to the foregoing and without waiver of any of Defendants' rights, the following individuals may have information that Defendants may use to support their claims and defenses in this action:

1. Plaintiff(s);
2. Members of Plaintiffs' and/or Plaintiffs' decedents' families;
3. Health care providers and treating physicians and psychiatrists, including those who prescribed Neurontin to Plaintiffs' and/or Plaintiffs' decedent;
4. Hospital, police and emergency personnel who investigated the incidents;
5. Pfizer employees and representatives who had any communications relating to Neurontin with, or were otherwise in contact relating to Neurontin with, the physician(s) who prescribed Neurontin to Plaintiffs' and/or Plaintiffs' decedents;
6. Defendants' employees and representatives with knowledge of the safety of Neurontin, including those listed below;
7. Any witnesses necessary to authenticate documents;
8. Any witnesses identified or disclosed by Plaintiffs or any other party.

Subject to the foregoing and without waiver of any of Defendants' rights, the following additional individuals may have information that Defendants' may use to support their claims and defenses in this action:

Warner-Lambert

Mi Dong
Elizabeth Garofalo
Lloyd Knapp
Linda LaMoreaux

Clinical Research and Development
Clinical Research and Development
Clinical Research and Development
Clinical Research and Development

Atul Pande	Clinical Research and Development
Mark Pierce	Clinical Research and Development
Charles Taylor	Clinical Research and Development
Helen Duda-Racki	Medical Information
Mike Davies	Medical Liaisons
LeeAnne Fogleman	Medical Liaisons
Richard Grady	Medical Liaisons
Lisa Kellett	Medical Liaisons
Ken Lawlor	Medical Liaisons
Joe McFarland	Medical Liaisons
Darryl Moy	Medical Liaisons
Elizabeth Attias	Medical and Scientific Affairs – Medical Liaisons
Adrian Bal	Medical and Scientific Affairs – Medical Liaisons
James Black	Medical and Scientific Affairs – Medical Liaisons
Jyoti Jankowski	Medical and Scientific Affairs – Medical Liaisons
Philip Magistro	Medical and Scientific Affairs – Medical Liaisons
William Sigmund	Medical and Scientific Affairs
Leslie Magnus-Miller	Medical and Scientific Affairs
James Parker	Regulatory
Alan Rubenstein	Regulatory
Janeth Turner	Regulatory
John Boris	Sales/Marketing
George Cavic	Sales/Marketing
J. Allen Crook	Sales/Marketing
Victor Delimata	Sales/Marketing
Chris DeSimone	Sales/Marketing
Robert Doyle	Sales/Marketing
John Ford	Sales/Marketing
Tim George	Sales/Marketing
Edda Guerrero	Sales/Marketing
John Howard	Sales/Marketing
Laura Johnson	Sales/Marketing
John Knoop	Sales/Marketing
Nancy Kohler	Sales/Marketing
John Krukar	Sales/Marketing
David Murphy	Sales/Marketing
John Richter	Sales/Marketing
Tim Windom	Sales/Marketing
John Woychick	Sales/Marketing

Pfizer

Larry Alphs	Clinical Development
Lalitha Aiyer	Drug Safety and Risk Management
Gretchen Dieck	Drug Safety and Risk Management
Greg Gribko	Drug Safety and Risk Management
Manfred Hauben	Drug Safety and Risk Management
Tina Ho	Drug Safety and Risk Management
Douglas Kargman	Drug Safety and Risk Management
Emily Lanigan	Drug Safety and Risk Management
Elizabeth Luczak	Drug Safety and Risk Management
Jeffrey Mohan	Drug Safety and Risk Management
Esperanza Molina	Drug Safety and Risk Management
Kathy Sigler	Drug Safety and Risk Management
Deepak Taneja	Drug Safety and Risk Management
Melissa Dana	Marketing
Suzanne Doft	Marketing
Allison Fannon	Marketing
Marino Garcia	Marketing
Craig Glover	Marketing
Christine Grogan	Marketing
Leigh Ann Hemenway	Marketing
John Krayacich	Marketing
John Marino	Marketing
Avanish Mishra	Marketing
Steve Piron	Marketing
David Probert	Marketing
Jason Totolis	Marketing
Meg Yoder	Marketing
Andrea Zeuchner Malone	Marketing
Nancy Mancini	Marketing Analytics
Robert Glanzman	Medical
Bruce Parsons	Medical
Leslie Tive	Medical
Christopher Wohlberg	Medical
Claire Wohlhuter	Medical
Suzan Carrington	Medical Grants
Maria McCauley	Medical Grants
Steve Brigandi	Medical/Program Planning & Management

Catherine Clary	Medical Information
Michelle Claussen	Medical Information
Helen Duda-Racki	Medical Information
John Rocchi	Medical Information
Julie Su	Medical Information
Adrian Vega	Medical Information
Ellen Dukes	Outcomes Research & Development
Kay Sumulak	Postmarket Safety
Rudi Altevogt	Regulatory
Mary Ann Carnel	Regulatory
Lucy Castro	Regulatory
Art Ciociola	Regulatory
Stephen Cristo	Regulatory
Andrea Garrity	Regulatory
Chris Pacella	Regulatory
Manini Patel	Regulatory
Drusilla Scott	Regulatory
Valerie Flapan	Review Committee
Carolyn Blankmeister	RMRS
Tim Hylan	RMRS
Jill Kerrick Walker	RMRS
Dale Amon	Sales
Kim Brett	Sales
Mark Brown	Sales
Chris Dowd	Sales
Mike Fox	Sales
Bruce Fleischman	Sales
Chris Gish	Sales
David Gruber	Sales
Dan Linden	Sales
Tamela Martin	Sales
Kathy Rivas	Sales
Michael Romano	Sales
James Schultz	Sales
Guy Cohen	Statistical Analysis

Subject to the foregoing and without waiver of any of Defendants' rights, the following additional individuals may have information relating to FDA issues pertaining to Neurontin that Defendants may use to support their claims and defenses in this action:

Paul Leber
Neuro-Pharm Group, LLC
11909 Smoketree Road
Potomac, MD 20854

Russell Katz
Director, Division of Neurology
FDA, FDA 120
1451 Rockville Pike, Room 4037
Rockville, MD 20852

Cynthia McCormick
McCormick Consulting LLC
9127 Friars Road
Bethesda, MD 20817

Sharon Hertz
Deputy Director
FDA, Division of Anesthesia, Analgesia, and Rheumatology Products
10903 New Hampshire Avenue
Silver Spring, MD 20993

Timothy McGovern
Supervisory Pharmacologist
Office of New Drugs
Center for Drug Evaluation and Research
FDA
10903 New Hampshire Avenue
Silver Spring, MD 20993

Laura A. Governale
Team Leader, Drug Use Data Specialist
Office of Surveillance and Epidemiology
Center for Drug Evaluation and Research
FDA
Bldg. 22, Room #4484
10903 New Hampshire Avenue
Silver Spring, MD 20993

To the extent any additional discovery and investigation provides additional facts and legal contentions that may substantially alter these disclosures, Defendants reserve the right to amend without prejudice any and all disclosures herein consistent with those developments, including product identification, identifying other relevant witnesses and additional areas of information which support Defendants' defenses in this case and identifying additional individuals with discoverable information that may be used to support their claims or defenses in this case.

B. Rule 26(a)(1)(B): A copy of, or a description by category and location of, all documents, data compilations, and tangible things that are in the possession, custody, or control of the party and that the disclosing party may use to support its claims or defenses, unless solely for impeachment.

Because discovery and investigation in these actions are ongoing, and because in many instances, Plaintiffs' counsel has not yet identified the physician(s) who prescribed Neurontin to Plaintiffs and Plaintiffs' decedents, Defendants are unable at the present time, based on the information reasonably available, to identify all documents, compilations, and tangible things, if any, that Defendants may use to support claims or defenses in these cases and the subject of such information.

Subject to the foregoing and without waiving any of Defendants' rights, Defendants submit the following list:

1. Documents produced by any party or any third party in this case or in the civil action captioned *United States of America ex rel. David Franklin v. Parke-Davis, et al.*, C.A. No. 96-11651-PBS (D. Mass.).
2. Documents introduced as exhibits during any fact or expert deposition in this case or in the civil action captioned *United States of America ex rel. David Franklin v. Parke Davis, et al.*, C.A. No. 96-11651-PBS (D. Mass.).
3. Medical records in the possession or control of Plaintiff, Plaintiff's attorneys or health care providers.

4. The applicable package insert for the drug manufactured by Defendants at issue in this case.

To the extent any additional discovery and investigation provides additional facts and legal contentions that may substantially alter these disclosures, Defendants reserve the right to amend without prejudice any and all disclosures herein consistent with these developments, including identifying additional areas of information, relevant documents, and tangible things that support their claims or defenses in this case.

Pursuant to Fed. R. Civ. P. 26(b)(5), Defendants object to disclosure or production of documents and materials generated during the course of this litigation that constitute attorney work product or that contain privileged attorney-client communications. These documents and materials may consist, among others, of communications or correspondence between counsel and Defendants, correspondence between counsel and consulting experts, and between Defendants and employees to facilitate the rendering of legal advice. These documents may be exempt from discovery pursuant to Fed. R. Civ. P. 26(b)(3), 26(b)(4)(B), and/or the applicable attorney-client and/or joint defense privilege.

Moreover, if Defendants identify certain documents that they believe contain trade secrets and other confidential research, development, or commercial information, such documents will be produced subject to an appropriate protective order.

- C. Rule 26(a)(1)(C): A computation of any category of damages claimed by the disclosing party.**

Not applicable.

- D. Rule 26(a)(1)(D): For inspection and copying as under Rule 34 any insurance agreement under which any person carrying on an insurance business may be liable to satisfy part or all of a judgment which may be entered in the action or to indemnify or reimburse for payments made to satisfy the judgment.**

Defendant is self-insured and has assets sufficient to satisfy any judgment that may be rendered in this matter.

Dated: November 15, 2007

/s/James P. Rouhandeh

James P. Rouhandeh

DAVIS POLK & WARDWELL
450 Lexington Avenue
New York, New York 10017
(212) 450-4000

- and -

/s/David B. Chaffin

David B. Chaffin

HARE & CHAFFIN
BBO # 549245
160 Federal Street
Boston, Massachusetts 02110
(617) 330-5000

*Attorneys for Defendants Pfizer Inc.,
Parke-Davis, a division of Warner-
Lambert Company and Warner-Lambert
LLC, Warner-Lambert Company, and
Warner-Lambert Company LLC.*